Supreme Court, U.S.
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No. 96-1409

In The
Supreme Court of the United States
October Term, 1996

AREA G HOME AND LANDOWNERS ORGANIZATION, INC. (HALO), DANIEL E. STONE, WARREN OLSON, AND JAMES M. CRAWFORD,

Petitioners,

vs.

ANCHORAGE, A Municipal Corporation,

Respondent.

On Petition for Writ of Certiorari
to the Alaska Supreme Court

RESPONDENT'S BRIEF IN OPPOSITION

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QUESTION PRESENTED

The Municipality of Anchorage (MOA) objects to Area G Home and Landowners Organization, Inc.'s, (HALO's) statement of questions presented as being argumentative and repetitive. See Sup. Ct. R. 14(a). More importantly, the Municipality objects to HALO's statement of questions presented because it assumes matters of state law that have been conclusively resolved against HALO. Namely, HALO has no separate and distinct geographical identity under either the law of the State of Alaska or the Municipality of Anchorage. Furthermore, residents of the Anchorage "Hillside" have no "right" to a separate veto-vote under the Municipal Charter on service area decisions where the area affected by the decision is broader than the "Hillside." HALO's petition does not properly present any question of federal law for review.

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JURISDICTION

This Court lacks jurisdiction to review the Alaska Supreme Court's decision in Area G Home and Landowners Organization, Inc. (HALO), et al. v. Anchorage, 927 P.2d 728 (Alaska 1996), because the decision rests on state law that is independent of the alleged federal question and is adequate to support the judgment.

STATEMENT OF THE CASE

The Municipality of Anchorage (MOA) objects to HALO's Statement of the Case because it primarily consists of argumentative and conclusory legal assertions. The Municipality adopts the Alaska Supreme Court's statement of "Facts and Proceedings," (HALO App. at 3a-10a), as a concise statement of the nature of the dispute and procedural history of the case. The Alaska Supreme Court subsequently affirmed the Alaska Superior Court's ruling based on the same reasoning used by the lower court. (Id. at 34a)

ARGUMENT

A. There Are No Jurisdictional Grounds for Review

This Court lacks jurisdiction to review the decision in Area G Home and Landowners Organization, Inc. (HALO), et al. v. Anchorage, 927 P.2d 728 (Alaska 1996), because the Alaska Supreme Court's decision rests on state law that is independent of the alleged federal question and is adequate to support the judgment. See Coleman v. Thompson, 501 U.S. 722, 729 (1991).[1]

The Anchorage Municipal Charter provides that service areas can only be created, altered, or abolished by a vote of residents "within the area

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[1] For reasons unknown to the Municipality of Anchorage, HALO's petition is described as a "Petition for a Writ of Certiorari to the United States Court of Appeals for the District of Columbia Circuit." Emphasis added. The Court of Appeals has in fact had no involvement in this case and the Municipality understands HALO's petition to be directed to the Alaska Supreme Court.

affected." (HALO App. at 4a) A provision of the Anchorage Municipal Code which was adopted 18 years before the present dispute, AMC 27.10.010(A), provides that the term "area affected" means "that area determined by the Assembly to be subject to significant change in the cost, quality, quantity, or other factor affecting the delivery of service therein if the proposed action is approved." (HALO App. at 21a) The Anchorage Assembly determined that all residents within the proposed expanded police service area, and not simply residents of the "Hillside" area of Anchorage, would be "affected" by the proposed expansion of the police service area. Thus all residents within the new proposed police service area were entitled to vote. The Assembly's decision was upheld by both the Alaska Superior Court and the Alaska Supreme Court.

The Alaska Supreme Court's holding that the Anchorage Assembly had a reasonable basis to conclude that the entire proposed police service area was the proper voting unit was based on resolution of two questions of state law. The first question was whether the term "area affected" as used in Anchorage Municipal Charter meant either (1) the geographical area to be added to or removed from a service area or (2) the area determined by the Assembly to be subject

to significant change in terms of cost, quality, quantity or other factor affecting the delivery of the service. (HALO App. at 12a-13a) Based on the language of the Anchorage Municipal Charter, the legislative history of the Municipal Charter, and the Municipal Ordinance which adopted the second definition 18 years ago, the Alaska Supreme Court held that the second definition was the correct interpretation of the Charter. (HALO App. at 16a-17a, 20a-22a) This issue had nothing to do with federal law.

The second question presented to the Alaska Supreme Court was whether there was an adequate factual record that voters within the entire police service area were significantly affected within the meaning of the Anchorage Charter by the proposed action. The Alaska Supreme also answered this question in the affirmative. (HALO App. at 23a-31a) This issue also had nothing to do with federal law.

HALO's equal protection/gerrymandering claim (under both the federal and state constitutions) was wholly dependent upon the assumption that the Hillside alone was the "area affected," and that Hillside voters therefore had a protected right to a separate vote. HALO's complaint thus asserted the ordinance was unconstitutional because "it deprives Hillside

residents of the right to separate vote in the 'area affected' by creation or alteration of a service area." (HALO App. at 108a, emphasis added.)

In its brief to the Alaska Supreme Court, the Municipality stated:

> HALO's equal protection/gerrymandering claim is dependent upon the assumption that the Hillside area has a right under the Charter to a separate Hillside vote because it is the only "area affected" by AO [Anchorage Ordinance] 96-30(S). If the Hillside is indeed the only "area affected," AO 96-30(S) violates the Charter and, in some unusual sense, may also violate equal protection guarantees. If residents throughout the new Anchorage Police Service Area are affected by AO 96-30(S), however, then every voter in the affected area was given an equally powerful vote. HALO's equal protection/ gerrymandering claim thus turns on the merits of HALO's prior claim and adds nothing to the analysis of this case.

(MOA App. at 2a-3a) The Alaska Supreme Court agreed with this analysis. The court stated:

> HALO's equal protection claims depend upon the assumption that the Hillside area has a right under the Charter to a separate vote because it is the only area affected by AO 96-30(S). Because we have concluded that APSA [Anchorage Police Service Area] was within the area affected, the Assembly correctly permitted APSA residents to vote. Thus, every voter within the area affected by AO 96-30(S) was given an equally powerful vote, and no person's right to equal protection was violated.

(HALO App. at 31a-32a) Given the Alaska Supreme Court's interpretation of the Anchorage Municipal Charter, HALO's equal protection/gerrymandering claim cannot possibly apply to this case.

Alternatively stated, the United States Supreme Court cannot provide the relief requested by HALO without "reversing" the Alaska Supreme Court's decision regarding what is the proper voting unit for this service area decision under the Anchorage

Municipal Charter. The Alaska Supreme Court concluded that the Anchorage Assembly could have reasonably determined that the entire police service area was an "area affected" within the meaning of the Anchorage Charter and therefore entitled to vote. (HALO App. at 23a-31a, 34a) Given this now unassailable state law finding, HALO does not have an equal protection/gerrymandering claim because every voter within the proper voting unit was given an equally powerful vote.

The fact that prior extensions of the Anchorage police service area were approved by a separate vote of the area to be added to the service area does not convert this case into one of federal constitutional law. It was clear in this case that a rational, fair, and equitable service area boundary should include the "Hillside" area of Anchorage. (See HALO App. at 27a-30a) Hillside residents, however, had voted on three occasions not to join the service area. (Id. at 7a) Hillside residents instead preferred to pay nothing to support the police and still enjoy most of the benefits of police service. A departure from prior practice was required, if this injustice was to be remedied. The Anchorage Assembly therefore exercised its authority to define proposed service area boundaries under the Municipal Charter. Its authority to do so was not

limited by the fact it had not had to take such action in the past.

Furthermore, as the Alaska Supreme Court noted, regardless of the practice followed by the Municipal Assembly in prior service area expansions, the Alaska Supreme Court is the final arbiter of the meaning of terms in the Anchorage Municipal Charter. (HALO App. at 19a) At this stage in the case, the Municipal Assembly, the Alaska Superior Court, and the Alaska Supreme Court have all uniformly determined that entire police service area was an "area affected" within the meaning of the Anchorage Municipal Charter. The Alaska Supreme Court's decision is determinative of the merits of HALO's petition.

Although irrelevant to this petition, HALO repeatedly contends that Hillside residents are being "punished" because they are "unruly," "politically incorrect," and vote the "wrong" way. These statements are misleading descriptions for the actual problem facing the Municipality. The actual problem was that one of the largest and wealthiest residential areas of the Municipality was able to enjoy most of the benefits of police service without paying anything to support that service. This had the effect of unfairly

burdening the rest of the Municipality with costs that should have been shared with Hillside residents. The Alaska Supreme Court summarized the situation as follows:

> The Hillside is a residential area that has grown from a population of approximately 2,500 in 1975 to a population of 25,000 now. It is relatively affluent; according to Mayor Rick Mystrom, its voting population is approximately ten percent of Anchorage's, but its residential property value comprises seventeen percent of the Anchorage total.
>
> Hillside residents do not pay for APD police service. Instead they rely on [free] Alaska state troopers for protection. However, Hillside residents benefit from APD services. APD provides emergency services and investigates major crimes in the Hillside. APD polices roads that border the Hillside and public institutions, such as Service High School, within the Hillside. About thirty APD officers

> reside in the Hillside and drive their patrol cars home, providing a limited patrol service for the Hillside. Many city-wide services provided by APD benefit Hillside residents. Those services include the 911 system, specialized units such as the bomb squad, and what the Municipality calls "safe city" functions. Safe city functions are programs designed to benefit all Anchorage residents and include crime prevention education, municipal prosecution, jail cells, patrols for safer recreation and shopping areas, and measures to reduce drunk driving.

(HALO App. at 5a-6a) Hillside residents were not punished because they were "politically incorrect." Hillside residents were simply required by a vote of all the residents within the "affected area" to pay their fair share of taxes to support police services which directly benefit Hillside residents. This vote complied with the definition of "area affected" in the Municipal Charter.

HALO also suggests that the "Hillside" area of Anchorage has some type of distinct and independent

geographical existence when it is simply an area which, by historical anomaly, remained after previous expansions of the police service area.[2] The Hillside is in fact part of the Municipality. There are no pre-determined service areas in the Municipality. The Hillside is not a political subdivision of the Municipality. The Alaska Supreme Court has confirmed that the task of determining what areas are affected by service area decisions is committed to the Anchorage Assembly. Under the Charter, the Assembly is responsible for establishing fair and equitable service area boundaries. There is no unique geographical boundary to the Hillside separate and apart from the service area boundary which is subject to modification under the procedures used by the Assembly, approved by the voters, and confirmed by the Alaska Supreme Court.

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[2] HALO variously refers to the Hillside as "a distinct, identifiable geographic area," a "distinct geographic area," a "historically identified cohesive geographic area." (Petition at i, 3, 6)

B. Any Federal Question That is Presented Does Not Warrant Supreme Court Review

Even assuming HALO raises a federal constitutional issue, the issue is not an important issue of federal law and the precedent set by this case will not affect anyone other than the residents of Anchorage, Alaska.

The fact that this petition does not present an important issue of federal law is evident from the cursory treatment the federal equal protection/gerrymander claim received below. HALO's only reference to the United States Constitution or any federal case law in its 50-page brief to the Alaska Supreme Court is found in one paragraph. (HALO App. at 78a-79a) In that one paragraph, HALO cited to Justice Fortas' definition of "gerrymandering" in his concurring opinion in Kirkpatrick v. Preisler, 394 U.S. 526, 538 (1969), and to Justice Stevens concurring opinion in Karcher v. Daggett, 462 U.S. 725, 749 (1983), wherein Justice Stevens stated that the equal protection clause prohibits racial, ethnic, religious, economic or political gerrymanders. It appears that these concurring opinions were simply cited for their reasoning in support of HALO's state equal protection claim. (See

HALO App. at 78a-83a) HALO did not even list the United States Constitution in its table of authorities in its Alaska Supreme Court brief. (MOA App. at 5a-6a) The issue of equal protection (under either the state or federal constitutions) was not even mentioned in HALO's reply brief. The parties realized that the decisive issue in this case was whether the Assembly had acted in accordance with the Municipal Charter. Thus the only justice who dissented from the Alaska Supreme Court's decision did not mention the subject of gerrymandering or equal protection anywhere in his extensive opinion. (See HALO App. at 35a-73a)

In addition, the issue raised by HALO does not present an important federal question given the unique language of the Anchorage Municipal Charter. The issue in this case is not likely to be confronted by any other court. Indeed, HALO states "this appears to be a case of first impression." (Petition at 16) This case is unique to Alaska because of the unique language of the Anchorage Municipal Charter. Further appellate review of this case would only affect residents of the Municipality of Anchorage.

Finally, there is also no conflict, direct or indirect, with any decision of any federal court. HALO primarily relies on three cases: Reynolds v.

Sims, 377 U.S. 533 (1964); Karcher v. Daggett, 462 U.S. 725 (1983), and a plurality opinion in Davis v. Bandemer, 478 U.S. 109 (1986). In Reynold v. Sims, the court held that a population variance of up to 41 to 1 in election districts for the Alabama State Legislature violated equal protection guarantees. In Karcher v. Daggett, the court held that population deviations among congressional districts in New Jersey, when not the result of a good-faith effort to achieve population equality, violated Article I, § 2, of the United States Constitution. In Davis v. Bandemer, the court held that a claim that a redistricting plan for the Indiana State Legislature was designed to disadvantage the Democratic Party stated a justiciable claim but held that there was insufficient evidence of discriminatory vote dilution.

In all of these cases, the ultimate voting unit was a given: it was the state. All of these cases were instead concerned with how to ensure that voters throughout the state had a fair chance to influence the political process with an equally powerful vote. The constitutional issues in all three cases resulted from the fact that individuals do not vote directly in Congress or a state legislature, but instead elect representatives. The question presented in these cases was how to draw membership districts within the state so as to maintain

the rights of voters throughout the acknowledged voting unit (the state) to a fair and equally powerful vote.

In this case, the voting unit was not a given, but was instead the only issue in dispute. Under the Anchorage Municipal Charter, voters within the "area affected" are entitled to vote on service area ordinances. HALO contended that the only "area affected" is the geographic area to be added or removed from a service area. (HALO App. at 12a-13a) The Alaska Supreme Court disagreed, concluding that the drafters of the Municipal Charter had rejected this definition in favor of the broader concept of "area affected." (Id. at 16a) The court further held that an ordinance passed 18 years ago reasonably defined the term "area affected" to mean the area "determined by the Assembly to be subject to significant change in the cost, quality, quantity or other factor affecting the delivery of [the] service." (Id. at 20a-22a) In this case, the existing police service area was within the "area affected" because it was required to subsidize an affluent residential area of the city in an amount in excess of $2 million a year and was required to divert police resources to that area even though Hillside residents had paid nothing to support the service. (Id. at 29a) In short, the Alaska Supreme Court held that

Hillside residents did not have a right under the Municipal Charter to veto efforts to terminate their free police service subsidy. This decision in no way conflicts with any federal precedent.[3]

HALO's final argument is that voters within the existing police service area were effectively "bribed" into voting in favor of the disputed ordinance because passage of the ordinance would terminate the Hillside police subsidy and save the residents of the existing police service area approximately $40 per year per household. (Petition at 26) **First**, this argument was not raised below. In fact, HALO argued below that this $40 amount was *de minimus* and therefore could not have "affected" the residents of the existing police service area. (MOA App. at 8a) This argument should be considered waived. **Second**, this argument does not make any sense. Voters frequently vote on issues that directly affect their pocketbook. Individuals vote on bonds, tax caps, sales taxes and similar

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[3] The additional cases cited by HALO prohibiting ballot stuffing, discarding ballots, and refusing to count ballots are equally inapposite in this case. No such conduct occurred in this case and the voting unit was not at issue in any of those cases.

measures. Many ballot propositions disproportionately benefit or burden different segments of society. For example, school bonds most directly benefit families with school age children while providing little benefit to retired couples. Likewise, a bed tax directly burdens the visitor industry while providing general funds for local government services. Finally, even Hillside residents would be disqualified from voting under HALO's reasoning. Hillside residents had been repeatedly "bribed" to vote against joining the service area because they would have had to pay several hundred dollars per household per year for their previously free police service benefits. **Third**, the two cases cited by HALO in support of this theory do not arguably apply in this situation. Both cases involve *quid pro qo* inducements to specific voters in order to obtain each individual's express agreement prior to the election to vote a certain way. Here the alleged "inducement" is the elimination of a unfair subsidy of general application which is not tied to a reciprocal promise from any voter.[4]

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[4] In Town of Fond du Lac v. City of Fond du Lac, 126 N.W.2d 201 (Wis. 1964), the city was attempting to annex land which included property owned by the city. The area proposed for annexation contained only a handful of voters. The city offered some of its

CONCLUSION

No relief can be provided to HALO without reinterpreting the Anchorage Municipal Charter. This Court should not reinterpret a municipal charter. If for some reason the Court believes that jurisdiction does exist, it should nevertheless deny HALO's petition. This case does not present an important question of federal law.

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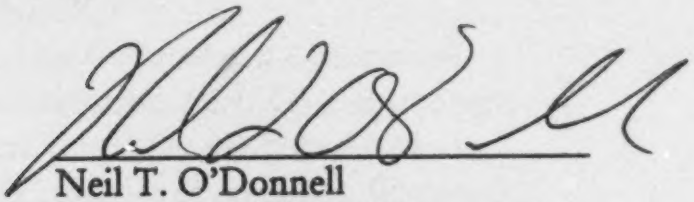
tenants one year's free rent if they agreed to vote in favor of annexation; others were told they would be evicted if they voted against annexation. In Hussey v. City of Portland, 64 F.3d 1260 (9th Cir. 1995), cert. denied, 116 S. Ct. 911 (1996), the city offered individual land owners a sewer connection subsidy, which could amount to "thousands of dollars," if they signed an irrevocable consent to annexation. The court noted that it would have been permissible to offer the subsidy to all homeowners as an inducement to vote for annexation as long as the subsidy was not directly linked to a person's vote. Id. at 1266.

Respectfully submitted this 27th day of March, 1997.



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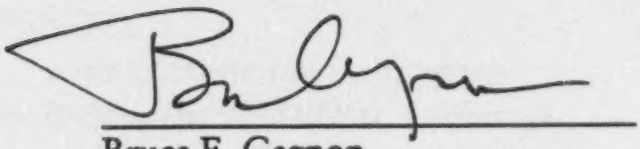

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APPENDIX A

Area G Home and Landowners Organization, Inc. (HALO) v. Anchorage, Supreme Court for the State of Alaska, No. S-7731, Brief of Appellee, (Excerpt), 8/19/96

IN THE SUPREME COURT OF THE STATE OF ALASKA

AREA G HOME AND LANDOWNERS ORGANIZATION, INC. (HALO), DANIEL E. STONE, WARREN OLSON, and JAMES M. CRAWFORD,	)
Appellants,	)
vs.	)
ANCHORAGE, A Municipal Corporation,	)
Appellee.	)

Superior Court Case No. 3AN-96-1661 CI
Supreme Court No. S-7731

APPEAL FROM THE SUPERIOR COURT FOR THE STATE OF ALASKA THIRD JUDICIAL DISTRICT AT ANCHORAGE
CASE NO. 96-01661 CI
THE HONORABLE KAREN L. HUNT

BRIEF OF APPELLEE (EXCERPT)

* * *

IV ARGUMENT

* * *

F. Hillside Residents Were Not Denied Equal Protection

HALO's equal protection/gerrymandering claim is dependent upon the assumption that the Hillside area has a right under the Charter to a separate Hillside vote because it is the only "area affected" by AO 96-30(S). If the Hillside is indeed the only "area affected," AO 96-30(S) violates the Charter and, in some unusual sense, may also violate equal protection guarantees. If residents throughout the new Anchorage Police Service Area are affected by AO 96-30(S), however, then every voter in

the affected area was given an equally powerful vote. HALO's equal protection/gerrymandering claim thus turns on the merits of HALO's prior claim and adds nothing to the analysis of this case.

APPENDIX B

Area G Home and Landowners Organization, Inc. (HALO) v. Anchorage, Supreme Court for the State of Alaska, No. S-7731, Brief of Appellants, (Excerpt), 8/6/96

IN THE SUPREME COURT OF THE STATE OF ALASKA

AREA G HOME AND LANDOWNERS ORGANIZATION, INC. (HALO), DANIEL E. STONE, WARREN OLSON, and JAMES M. CRAWFORD,	)
Appellants,	)
vs.	)
ANCHORAGE, A Municipal Corporation,	)
Appellee.	)

Superior Court Case No. 3AN-96-1661 CI
Supreme Court No. S-7731

APPEAL FROM THE SUPERIOR COURT FOR
THE STATE OF ALASKA THIRD JUDICIAL
DISTRICT AT ANCHORAGE
CASE NO. 96-01661 CI
THE HONORABLE KAREN L. HUNT

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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA THIRD JUDICIAL DISTRICT AT ANCHORAGE

AREA G HOME AND LANDOWNERS ORGANIZATION, INC. (HALO), DANIEL E. STONE, WARREN OLSON, and JAMES M. CRAWFORD,

Plaintiffs,

vs.

ANCHORAGE, A Municipal Corporation,

Defendant.

Superior Court Case No. 3AN-96-1661 CI

PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION
(EXCERPT)

[3] The MOA argues that residents of the "new" police service area who were previously provided with police protection through APSA would see a "significant change downward in the cost of police services as they would be relieved of the burden of subsidizing the Hillside." The individual impact of that reduction was actually estimated by the City to be only approximately $40/year on a typical $180,000 home. *See* Def. Opp., Ex. 7 at 7. In today's economy, $40.00 will only buy two men's haircuts, a couple of tanks of gas, two concert tickets at the Sullivan Arena, or a single visit with a chiropractor.

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